

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>UNITED STATES OF AMERICA</b>	§	
	§	
<b>v.</b>	§	<b>CASE NO. H-4:17-cr-00651-6</b>
	§	
<b>WILLIAM LOPEZ,</b>	§	
	§	
<b>Defendant.</b>	§	

**GOVERNMENT'S OFFER OF TRIAL EXHIBITS UNDER CrLR 55.2**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States of America, hereinafter referred to as "the Government," by and through its United States Attorney for the Southern District of Texas, and Assistant United States Attorneys assigned to this matter, and files this Offer of Trial Exhibits under Criminal Local Rule ("CrLR") 55.2, as follows:

**I. Trial Exhibits**

Prior to December 6, 2024, the United States notified defense counsel by this motion that copies of the foregoing items are available from the U.S. Attorney's Office in Houston, Texas. In addition, many of the items have already been provided to defense counsel in discovery or have been made available for his review at his convenience. Said items are exhibits that the Government intends to introduce in its case-

in-chief in this cause of action:

No.	Description
1	Photos and Maps of 6011- 6023 Dashwood Drive, Houston, Texas (19 pages)
2	Photos of Aneth Bermudez Potosme
2.1	Photos from 2015-2016 (2 pages)
2.2	Photos of Tattoos (3 pages)
2.3	Photos of Injuries (5 pages)
2.4	Nicaragua Identification
3	Photos of Andrea Arely Azamar Pozos
3.1	Photos from 2011-2012
3.2	Photos of Tattoos (2 pages)
4	Photos of Ever Mejia Rodriguez
4.1	Photos from 2011
4.2	Photos from 2014
4.3	Photo of Passport]
4.4	Photos of tattoos (2 pages)
5	Photos of Maria Adelina Martinez Velazquez
5.1	Photos from 2010-2012 (7 pages)
5.2	Photo of Tattoo
6	Photos of Bessy Gomez
6.1	Photo of Bessy Gomez in Cancun
6.2	Mexican Acta de Nacimiento (Birth Certificate) of Bessy Gomez
7	Photo of Cynthia Obando Potosme (2 pages)
8	Photo of Nohemi Bermudez Potosme
9	Photos of Claudia Soriano Hernandez (CSH)
9.1	Photo of CSH
9.2	Photo of CSH Face Burn
9.3	Photo of CSH Tattoo
9.4	Photo outside of money order business (2 pages)
10.	Photos of Yessenia Elizabeth Mejia Canallas
10.1	Photo of Tattoo

10.2	Photos of Bruising (2 pages)
11	Photos of Brenda Alvarez Sanchez (BAS)
11.1	Honduran Identification
11.2	Photo of Tattoo
12	Photographs from Cancun Brothel (20 pages)
13	Fake Foreign Identification documents of William Lopez (WL)
13.1	Juarez Mexico Driver's License
13.2	Cancun Driver's License
13.3	Honduran Identification
13.4	Puebla Mexico Driver's License
13.5	Mexican Clave
13.6	Acta de Nacimiento (Birth Certificate) (2 pages)
14	Acta de Nacimiento (Birth Certificate) of Freddy Montes
15	Photographs of 1110 Coral Street Houston, Texas 77012
15.1	Photos of Ever Mejia Rodriguez (2 pages)
15.2	Photos of Freddy Montes (8 pages)
15.3	Photos of 1110 Coral Street Houston, Texas 77012 (4 pages)
15.4	Photos of Pick up Black pickup truck (2 pages)
16	Photos of Brothel/Residence in Cancun, Mexico (2 pages)
17	Photo of William Lopez with Syringe and Drug
18	Ledgers (28 pages)
19	Excerpt from Facebook Page of Freddy Montes
20	Medical Records of Andrea Azamar
20.1	Records from December 26, 2012 (4 pages)
20.2	Records from January 3, 2013 (2 pages)
21	Photos of Raul Moreno- Reyna at 6011-23 Dashwood Drive (5 pages)
22	Screenshot of Contact information for Plastic Surgery Procedures Houston
23	Advertisement for Brothel at 6011-23 Dashwood Drive given out at Flea Market
24	Photo of Eric Ivan Alvarez- Chavez at 6011-23 Dashwood Drive Houston, Texas
25	Photo of Anadalit Duarte at 6011-23 Dashwood Drive
26	Excerpt of text conversation between Gloria Potosme and Maria Angelica Moreno-Reyna
27	Melisa Dominguez home at Hermosa Vida in Donna, Texas- Photo

	taken by Gloria Potosme (3 pages)
28	Record of payment to William Lopez through Caraveo Chavira Maite Yatzeli
28.1	Screenshot of Conversation with William Lopez (2 pages)
28.2	Money Transfer receipt to William Lopez through Caraveo Chavira Maite Yatzeli
29	Record of payment to William Lopez
29.1	Screenshot of text conversation with William Lopez
29.2	Money Transfer receipt to William Lopez through Yessica Sugey Caraveo Chavira
29.3	Photograph of Yessica Sugey Caraveo Chavira
29.4	Social media page of Yessica Sugey Caraveo Chavira (3 pages)
30	Record of payment to William Lopez and Raul Moreno-Reyna through Adriana Oliva Perdomo
30.1	Screenshot of text conversation with William Lopez
30.2	Money Transfer receipt to William Lopez through Adriana Olivia Perdomo
30.3	Money transfer receipt to Raul Moreno (2 pages)
30.4	Fake Mexican birth certificate for Adriana Oliva Perdomo
30.5	Photo of Adriana Oliva Perdomo
31	Money Transfer Receipt to William Lopez through third parties
31.1	Money Transfer Receipts to William Lopez through Juan Carols Munoz Castillo
31.2	Money Transfer Receipt to William Lopez through Stephania Munoz Castillo (3 pages)
31.3	Bank of America withdrawal for money order
32	Photo at the Maria Bonita Cantina
33	Photos of customer at 6011-23 Dashwood Drive (2 pages)
34	Photo of women working in prostitution at 6011-23 Dashwood (23 pages)
35	Honduran Identification of Cristina Lopez Torres (2 pages)
36	Purse provided from FBI for video recording
37	Video Recording of Prostitution Activity
38	Audio Recordings of Ever Mejia Rodriguez in July, 2012 and January, 2013
39	Birth Certificate of Kendra Angelina Lopez
40	A-File of Aneth Bermudez Potosme.

41.1	Notice of Order of Expedited Removal dated May 10, 2016
41.2	Record of Sworn Statement in Proceedings under Section 235(1)(1) of the Act, dated May 10, 2016
41.3	Asylum Officer Interview, dated June 13, 2016
41.4	Notice to Appear, dated June 17, 2016
41.5	Notice of Custody Determination, dated July 6, 2016
41.6	Notice to EOIR: Alien Address, dated July 7, 2016
41.7	Application for T Nonimmigrant Status, filed March 28, 2017
41.8	Approval of T-1 Nonimmigrant Classification, dated June 26, 2018
41.9	Application for Advance Permission to Enter as Nonimmigrant, dated March 23, 2017
41.10	Approval of Advance Permission to Enter as Nonimmigrant, dated June 26, 2018
41.11	Order of Removal to Mexico, dated March 18, 2019
41.12	Order Granting Motion to Reopen Removal Proceedings, dated July 13, 2020
41.13	Order of Supervision, dated July 19, 2019
41.14	Order Terminating Removal Proceedings, dated November 5, 2020
41.15	Application to Register Permanent Residence or Adjust Status, dated December 28, 2021
42	A-File of Andrea Arely Azamar Pozos
42.1	Acta de Nacimiento (Birth Certificate)
42.2	Passport
42.3	Employment Authorization Documents
42.4	Application for T Nonimmigrant Status, dated February 23, 2018
42.5	Application for Advance Permission to Enter as a Nonimmigrant, dated March 23, 2018
42.6	Approval of Application for Advance Permission to Enter as Nonimmigrant, dated May 30, 2019
42.7	Application to Register Permanent Residence or Adjust Status, dated December 8, 2022
43	A-File of Ever Mejia Rodriguez
43.1	Passport
43.2	Record of Deportable/Inadmissible Alien, dated April 24, 2012
43.3	Notice and Order of Expedited Removal, dated April 26, 2012
43.4	Departure Verification, dated April 27, 2012
43.5	Record of Sworn Statement in Proceedings Under Section 235(b)(1)

	of the Act dated April 26, 2012
43.6	Record of Deportable/Inadmissible Alien, dated July 18, 2023
43.7	Record of Sworn Statement in Affidavit Form, dated July 20, 2013
43.8	Warrant of Removal/Deportation, dated July 20, 2013 and Removal dated July 22, 2013
43.9	Application for Advance Permission to Enter as a Nonimmigrant, dated November 29, 2016
43.10	Application for T Nonimmigrant Status, dated November 29, 2016
44	A-File of Maria Adelina Martinez Velazquez
44.1	Acta de Nacimiento (Birth Certificate)
44.2	Passport
44.3	Employment Authorization Card
44.4	Photograph when apprehended by immigration authorities on August 8, 2010
44.5	Record of Deportable/Inadmissible Alien, dated July 16, 2012
44.6	Application for T Nonimmigrant Visa, dated August 2, 2012
44.7	Application for Advance Permission to Enter as Nonimmigrant, dated August 2, 2012
44.8	Application to Register Permanent Residence or Adjust Status, dated June 14, 2016
45	A-File of Adriana Oliva-Perdomo
45.1	Record of Deportable/Inadmissible Alien
46	A-File of Brenda Alvarez-Sanchez
46.1	Record of Deportable/Inadmissible Alien, dated September 2, 2016
46.2	Notice to Alien Ordered Removed/Departure Verification, dated September 23, 2016
46.3	Notice of Expedited Removal, dated September 2, 2016
46.4	Record of Sworn Statement under Section 235(b)(1) of the Act, dated September 2, 2016
46.5	Record of Deportable/Inadmissible Alien, dated September 10, 2016
46.6	Warrant of Removal/Deportation, dated September 11, 2016
46.7	Notice of Intent/Decision to Reinstate Prior Order, September 11, 2016
46.8	Affidavit, dated September 11, 2016
46.9	Record of Deportable/Inadmissible Alien, dated September 14, 2016
46.10	Warrant of Removal/Deportation, dated September 14, 2016

46.11	Notice of Intent/Decision to Reinstate Prior Order, September 14, 2016
46.12	Affidavit, dated September 14, 2016
46.13	Notice of Intent/Decision to Reinstate Prior Order, February 23, 2017
46.14	Record of Deportable/Inadmissible Alien, dated December 11, 2017
46.15	Notice of Intent/Decision to Reinstate Prior Order, December 11, 2017
46.16	6.16 Affidavit, dated December 11, 2017
47	Items recovered from Apartment 13B at 6011-23 Dashwood Drive
48	Items recovered from Apartment 14B at 6011-23 Dashwood Drive
49	Items recovered from Apartment 23B at 6011-23 Dashwood Drive
50	Photos of and items recovered from Apartment 26B at 6011-23 Dashwood Drive
50.1	Items recovered
50.2	Photos of door (2 pages)
50.3	Photos of firearms (8 pages)
50.4	Photos of cash (4 pages)
51	Photos of and items recovered from Apartment 27B at 6011-23 Dashwood Drive
51.1	Items recovered
51.2	Photo of door
51.3	Photo of sim card in toilet (5 pages)
51.4	Photos of cash (11 pages)
51.5	Photos of firearms (24 pages)
51.6	Photos of identification and ownership documents (12 pages)
51.7	Photos of condoms (6 pages)
51.8	Wire transfer record to Cancun
51.9	Photos of alleged methamphetamine recovered from prescription bottle (2 pages)
52	Photos of and items recovered from Apartment 30A at 6011-23 Dashwood Drive
52.1	Items recovered
52.2	Photos of door and phone at entrance (3 pages)
52.3	Photos of identification and ownership documents (7 pages)
52.4	Photos of condoms and cash at kitchen table (4 pages)
52.5	Photos of cash (4 pages)

52.6	Photos of firearms (12 pages)
53	Photos of and items recovered from Apartment 31B at 6011-23 Dashwood Drive
53.1	Items recovered
53.2	Photo of door
53.3	Photo of identification and ownership documents (6 pages)
53.4	Photos of firearms (36 pages)
53.5	Photos of cash (4 pages)
53.6	Photos of money counter (2 pages)
53.7	Scale and drugs (10 pages)
53.8	Photo of Rolex watch
53.9	Ledger
54	Photos of and items recovered from Apartment 32B at 6011-23 Dashwood Drive
54.1	Items recovered
54.2	Photos of main room (2 pages)
54.3	Photos of firearms (32 pages)
54.4	Photos of drugs (17 pages)
55	Photos of and items recovered from Apartment 33B at 6011-23 Dashwood Drive
55.1	Items recovered
55.2	Photos (5 pages)
56	Photos of and items recovered from Melisa Dominguez' residence at Hermosa Vida, Donna, Texas
56.1	Items recovered
56.2	Photos of front of location (2 pages)
56.3	Photos of identification and ownership documents (8 pages)
56.4	Photos of human smuggling activity (6 pages)
56.5	Photos of drugs and drug paraphernalia (8 pages)
57	Surveillance pole camera video of 6011-23 Dashwood Drive
58	Surveillance pole camera video of Jessamine Street
59	Surveillance pole camera video of 3737 Hillcroft Street.
60	Consensual recordings by confidential human source on: December 3, 4, 16, 18, 19, 22, 24, 25, 30, 2016; January 1, 4, 6, 7, 9, 10, 15, 16, 17, 19, 24, 25, 27, 29, 30, 31, 2017; February 3, 4, 5, 6, 7, 16, 28, 2017; and March 1, 2, 3, 4, 6, 8, 10, 13, 16, 2017.
60.1	Audio recordings



60.2	Translated transcription of audio recordings
61	Title III Intercepted telephonic conversations from April, 2017 through August, 2017
61.1	Audio recordings
61.2	Translated transcription of audio recordings

As noted, the Government intends to introduce these items at trial, which is currently scheduled for jury selection on December 16, 2024.

- A. It should be noted that all exhibits provided may not be introduced at trial during the Government's case-in-chief. The Government anticipates that some of the exhibits listed may not be deemed necessary at time of trial and that some exhibits not listed (but set forth in discovery) may be deemed necessary at time of trial. Therefore, this notice may not include all the items that may be produced at trial but is a list of the primary evidence the Government would submit in evidence at trial and, thus, is offered in advance per CrLR 55.2 for the purpose of judicial economy and efficiency.

## **II. The Rule**

- A. CrLR 55.2 provides in pertinent part:

**A. Authentication of Exhibits.** A party requiring authentication of an exhibit must notify the offering party in writing within seven days after the exhibit is listed and made available. Failure to object in advance of trial in writing concedes authenticity.

**B. Objections to Exhibits.** Objections to admissibility of exhibits must be made at least seven business days before trial by notifying the

Court in writing of the disputes, with copies of the disputed exhibit and authority.

B. Said exhibits are set forth and provided in compliance with said rule.

### **III. Prayer**

WHEREFORE, the United States prays that said exhibits are held admissible on grounds that they are what they purport to be, and thus "authenticated" for purposes of trial, should no objection be made in accordance with CrLR 55.2.

Date: December 6, 2024

Respectfully submitted,

ALAMDAR S. HAMDANI

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By: *s/ Adam Laurence Goldman*

Adam Laurence Goldman

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*Counsel for the United States of America*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 6<sup>h</sup> day of December, 2024, I electronically filed this document with the Clerk of Court using CM/ECF, to which the following opposing counsels are members:

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*s/ Adam Laurence Goldman*

Adam Laurence Goldman, Asst. U.S. Atty.